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and KSK Corporation, A CNMI Corporation

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

**LI YING HUA, LI ZHENG ZHE, and XU
JING JI,**

Plaintiffs,

vs.

**JUNG JIN CORP., a CNMI corporation,
ASIA ENTERPRISES, INC., a CNMI
corporation, PARK HWA SUN, KIM
HANG KWON, KSK CORPORATION, a
CNMI corporation, and KIM KI SUNG,**

Defendants.

Case No. CV 05-00019

**DECLARATION OF KIM KI
SUNG IN OPPOSITION TO
SUMMARY JUDGMENT**

Date: July 17, 2008

Time: 9:00 a.m.

Comes now Kim Ki Sung who declares as follows:

1. I am a defendant in this case and I possess personal knowledge of all matters set forth herein and am competent to testify concerning such matters if so called.
2. I am a citizen of Korea.
3. Within the Korean culture, Koreans will associate together in a group which is known or referred to as Gyue which is somewhat difficult to explain the intricacies of its operation.

4. Generally, a Gyue is an association wherein teach members agree to deposit a certain amount of money each month for a set time frame. The monthly deposits are made in cash.
5. On as monthly basis the members alternate in withdrawing the full amount deposited into the Gyue to use as they like.
6. Once a member withdraws the funds due him for a month he must include a payment of interest with all of his subsequent monthly payments.
7. This effectively means that the amount of money withdrawn by each subsequent member will be a little more each month because of such interest payment.
8. Gyues are based on an underlying principle of mutual trust and are not formed by a written agreement signed by the members. However, each Gyue has a person who is something akin to a "Fund Manager" who keeps track of the deposits and withdrawals.
9. I was involved in a 30 member Gyue for the period November, 2004 to May, 2007. Each member had to deposit \$2,000.00 monthly into the Gyue with those who having made a withdrawal also paying a small amount of interest. he "Fund Manager" for the particular Gyue was Kim, Chang Rycul.
10. I was first in line in the Gyue and on or about November 30, 2004 I withdrew sixty thousand dollars (\$60,000.00) which was the total amount deposited by all of the members.
11. Attached hereto as Exhibit A is a copy of the withdrawals from the Gyue as kept by Kim, Chang Rycul
12. On or about December, 2004 I loaned \$100,000.00 cash to certain defendants in this case. Of the \$100,000.00, \$60,000.00 consisted of the money I withdrew from the Gyue with the \$40,000.00 balance being my own personal funds.
13. That \$100,000.00 loan was the basis for the \$100,000.00 promissory note signed by Jing

Jun Corporation on December 1, 2004. The balance \$40,000.00 was from my personal funds.

14. A copy of the promissory note is attached to my March 9, 2006 deposition as Exhibit D.

I declare under penalty of perjury pursuant to the laws of the United States of America that the above is true and correct and execute this declaration on Saipan on this 7th day of July, 2008.

_____/s/_____
Kim, Ki Sung

EXHIBIT A

1	7월라	234-3312	\$60,000.00	2004.11.30	(KIM/HI)
2	뉴-마트<아모>	235-2949	\$60,000.00	12.30	
3	심로왕	323-1958	\$60,600.00	2005.1.30	
4	가라판 마켓	233-4989	\$61,200.00	2.30	
5	용찬	0-433-9410	\$61,800.00	3.30	
6	뮤직뱅크	235-7725	\$62,400.00	4.30	
7	말스	235-4799	\$63,000.00	5.30	
8	초	233-3379	\$63,600.00		
9	패션	235-0099	\$64,200.00		
10	메모	234-1004	\$64,800.00		
11	정우	235-6541	\$65,400.00		
12	7/11	234-0202	\$66,000.00	10.30	(7/11)
13	석준	322-4391	\$66,600.00	11.30	
14	풀, 다빈	234-3811235-1135	\$67,200.00	12.30	
15	가라판 마켓	322-8181	\$67,800.00	2006.1.30	
16	용찬	287-0001	\$68,400.00	2.30	
17	메모 친구	234-1004	\$69,000.00	3.30	
18	뮤직뱅크	235-7725	\$69,600.00	4.30	
19	심로왕	323-1958	\$70,200.00	5.30	
20	맥심	234-3351	\$70,800.00	6.30	
21	7/11	287-1515	\$71,400.00	7.30	
22	한미 친구	233-2211	\$72,000.00	2008.30.30	
23	초	233-3379	\$72,600.00	9.30	
24	7/11	287-1515	\$73,200.00	10.30	
25	말스	235-4799	\$73,800.00	11.30	
26	뉴-마트	235-2949	\$74,400.00	12.30	
27	메모	234-1004	\$75,000.00	2007.1.30	
28	한미	233-2211	\$75,600.00	2.30	
29	말스	235-4799	\$76,200.00	3.30	
30	7/11	287-1515	\$76,800.00	4.30	
31	7-마켓	234-3312	\$77,400.00	5.30	

1. 깃날은 매월 30일로 한다. <깃돈은 잘 내지 않을 경우 그달에 태워 주지 않는다.>

2. 깃돈은 꼭 현찰이어야 한다. <TC, 수표는 절되 안 됨, 보증인을 세운다.>

3. 깃돈은 PM : 12 ~ 1시 사이에 갖고 오지 않을 경우 벌금 \$ 30.00 추가한다.

4. 매월 30일이 추석, 구절, 일요일 경우에만 다음 날로 한다.

5. 깃날 게원이 사이판 출타시 게주나 아는 사람에게 말기고 게주에게 연락한다.